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January 5, 2022

Hon. Vernon S. Broderick, USDJ
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 01/06/22

Re: Soto v. Triumph Construction Corp. et al.
Docket No.: 21-cv-02449-VSB

Dear Judge Broderick,

I represent Plaintiff in this matter. For the reasons that follow, I write with Defendants' consent to request an extension of time to submit a joint letter along with the proposed case management plan from today to Friday, January 7, 2022. This is the first request of this type and there is no prejudice to any party.

I was out of the country and, owing to well known difficulties with flights, returned home in the early morning of today. As a result, I came to the office in late afternoon and simply was unable to complete the assignment with defense counsel. I will have forwarded to them a draft letter and a draft case management plan tonight and I have a commitment from defense counsel that they will confer and respond to it tomorrow, so that we can file the documents on Friday, January 7, 2022.

Wherefore, Plaintiff respectfully requests that the Court grant an extension of time until Friday, January 7, 2022 to submit a joint letter about the case along with the proposed case management plan.

Respectfully submitted,

/s/ Robert Wisniewski
Robert Wisniewski